

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KRISTINA MIKHAYLOVA,

Plaintiff,

-against-

BLOOMINGDALE'S, INC., BLOOMINGDALE'S, INC. d/b/a BLOOMINGDALE'S AND FORTY CARROTS, BLOOMINGDALE'S, LLC, BLOOMINGDALE'S, LLC d/b/a BLOOMINGDALE'S NEW YORK, MACY'S, INC., MACY'S, INC. d/b/a MACY'S OF NEW YORK, UNITED STOREWORKERS RETAIL, WHOLESALE AND DEPARTMENT STORE UNION AFL-CIO LOCAL 3 a/k/a LOCAL 3 UNITED STOREWORKERS RWDSU/UFCW, DENNIS DIAZ, individually, CHRISTOPHER CASTELLANI, individually, RICHARD LAW, individually, and BOBBY BOOKER, individually,

Defendants.

Civil Action No. 1:19-cv-08927-GDB

**NOTICE OF PLAINTIFF'S
MOTION TO ALTER OR AMEND
JUDGMENT**

Please take notice that upon the annexed affirmation of Melissa Mendoza, Esq. and accompanying Memorandum of Law, a motion will be made as follows:

PLACE OF MOTION:

U.S. District Court
Southern District of New York, before Hon.
George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

OBJECT OF MOTION:

An Order granting motion to alter or amend the Court's Judgment of November 13, 2023, to dismiss Plaintiff's pregnancy, sex/gender, and disability discrimination, retaliation,

failure to accommodate claims under the New York State Human Rights Law, N.Y. Exec. Law 278 (NYSHRL) and the New York City Administrative Code 8-107 (“NYCHRL”) without prejudice, together with such other and further relief the Court deems just and proper.

Dated: December 11, 2023
New York, New York

DEREK SMITH LAW GROUP, PLLC
Attorneys for Plaintiff

/s/Melissa Mendoza

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